

## **STATIONARY SOURCE PERMIT TO OPERATE**

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Siegwerk Publications USA, Inc.  
P.O. Box 10064  
Lynchburg, VA 24506  
Registration No.: 30595

is authorized to operate

an ink manufacturing facility

located at

4225 Murray Place  
Lynchburg, VA

in accordance with the Conditions of this permit.

Approved on <<Date>>.

Regional Director, Department of Environmental Quality

Permit consists of 6 pages.  
Permit Conditions 1 to 13 .

## **INTRODUCTION**

This permit approval is based on the permit application dated July 31, 2006, including amendment information dated August 28, 2006, September 5, 2006, and September 7, 2006. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

## **PROCESS REQUIREMENTS**

1. **Equipment List** - Equipment at this facility consists of the following:

- ink manufacturing equipment, including tanks, blenders, mixers, solvent transfer system, 2 loading racks, and soil vapor extraction and groundwater recovery system.

(9 VAC 5-80-850)

2. **VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.

(9 VAC 5-80-850)

### **OPERATING LIMITATIONS**

3. **Production** - The production of ink shall not exceed 24,000,000 pounds per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9 VAC 5-80-850)

### **EMISSION LIMITS**

4. **Emissions Limits** - Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the ink manufacturing facility shall be less than 10 tons per year of any individual HAP and less than 25 tons per year of any combination of HAPS, calculated monthly as the sum of each consecutive 12 month period.  
(9 VAC 5-80-850)
5. **Leak Detection and Repair** – The permittee shall institute a fugitive Leak Detection and Repair Program per 63 Subpart TT – National Emission Standards for Equipment Leaks or equivalent Leak Detection and Repair Program approved by DEQ.  
(9 VAC 5-80-850)

### **RECORDS**

6. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
  - a. Annual production of ink, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
  - b. Annual emissions of individual HAPs calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
  - c. Results of all inspections required by the fugitive Leak Detection and Repair Program, including at least unit #, unit type, service type, date of inspection, results, and inspector.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-900)

## **GENERAL CONDITIONS**

7. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:
- To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
  - To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
  - To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
  - To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.  
(9 VAC 5-170-130 and 9 VAC 5-80-850)

8. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the South Central Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the South Central Regional Office in writing.  
(9 VAC 5-20-180 C and 9 VAC 5-80-850)
9. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.  
(9 VAC 5-20-180 I and 9 VAC 5-80-850)
10. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the

affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the ink manufacturing equipment:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.

(9 VAC 5-50-20 E and 9 VAC 5-80-850)

**11. Permit Suspension/Revocation** - This permit may be revoked if the permittee:

- a. Knowingly makes material misstatements in the permit application or any amendments to it;
- b. Fails to comply with the terms or conditions of this permit;
- c. Fails to comply with any emission standards applicable to a permitted emissions unit;
- d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;
- e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application for this permit is submitted;
- f. Fails to comply with the applicable provisions of Articles 6, 8 and 9 of 9 VAC 5 Chapter 80.

(9 VAC 5-80-1010)

**12. Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall

notify the South Central Regional Office of the change of ownership within 30 days of the transfer.

(9 VAC 5-80-940)

13. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.

(9 VAC 5-80-860 D)

